

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

S.A. HOSPITALITY GROUP, INC.,)	
)	
Plaintiff,)	
)	Case No.: 2:19-cv-2025
vs.)	
)	
ARCH SPECIALTY INSURANCE COMPANY,)	
)	
Defendant.)	

**NOTICE OF REMOVAL OF ACTION
UNDER 28 U.S.C. §1441(b) (DIVERSITY)**

Defendant, Arch Specialty Insurance Company (“Arch”) removes this action based on diversity of citizenship and the amount in controversy, 28 U.S.C. § 1332(a), and in support thereof states as follows:

1. On or about November 28, 2018, Plaintiff, S.A. Hospitality Group, Inc. (“S.A.”) filed the Complaint against Arch in the Chancery Court of Shelby County, Tennessee for the Thirtieth Judicial District at Memphis, Case No. CH-18-1694-3 where this case is now pending. Plaintiff served Arch with a copy of the Complaint on December 11, 2018. A true and accurate copy of the Complaint and referenced Exhibits is attached as Exhibit A.

2. Copies of all other filings in the state court action are attached as collective Exhibit B.

3. Plaintiff, SA, is a corporation organized under the laws of the State of Tennessee with a principal place of business in Memphis, Tennessee.

4. Defendant, Arch, is a Missouri corporation with its principal place of business in Jersey City, New Jersey.

5. The amount in controversy in the above-entitled action, exclusive of interest and costs, exceeds Seventy-Five Thousand (\$75,000) Dollars.

6. The initial notice of removal was filed within thirty (30) days after Arch's receipt of the Complaint filed and served by Plaintiff.

7. This court has original jurisdiction over the above-entitled action pursuant to 28 U.S.C. § 1332(a) based upon diversity of citizenship and the amount in controversy. This action may therefore be removed to this court pursuant to 28 USC §1441(b).

WHEREFORE, Defendant, Arch Specialty Insurance Company, respectfully request that this cause be removed to the United States District Court for the Western District of Tennessee.

Respectfully submitted,

ARCH SPECIALTY INSURANCE
COMPANY

/s/ Chris L. Vlahos
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*Attorneys for Arch Specialty Insurance
Company*

CERTIFICATE OF SERVICE

I, Chris L. Vlahos, hereby certify that on January 8, 2019, a copy of the foregoing pleading, **NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. § 1441(b) (DIVERSITY)**, was filed electronically. Notice of this filing will be served via U.S. Mail on Plaintiff's counsel, at the following:

John B. Philip
Crislip, Philip & Royal
5170 Sanderlin, Suite 201
Memphis, TN 38117

/s/ Chris L. Vlahos